# IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF: RANDY LEE HOLLOWAY JR. CHAPTER 13 NO: 21-11848-JDW

### CREDITOR'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

**COMES NOW**, ONEMAIN FINANCIAL GROUP, LLC., by and through counsel, and files this Objection to Confirmation of Chapter 13 Plan which plan was filed by Debtors<sup>1</sup> herein for the following reasons:

- Debtors filed a petition for bankruptcy pursuant to Chapter 13 of the United States
   Bankruptcy Code. The Court has jurisdiction of this matter pursuant to 28 U.SC. §§157
   and 1334 and 11 U.S.C. §§105 and 1325.
- 2. Creditor is a secured creditor of the Debtors.
- 3. Creditor filed a proof of claim, (being claim #4-1) in this matter secured by a 2007 Chevrolet Tahoe.
- 4. Creditor objects to the confirmation of the Debtors plan as it fails to provide for proper payment of the secured claim filed by Creditor.

WHEREFORE, PREMISES CONSIDERED, ONEMAIN FINANCIAL GROUP,

LLC., respectfully prays that this Court deny the confirmation of the Debtors Chapter 13 Plan for the reasons set forth herein, grant attorney's fees to Creditor, and such other relief as this Court may deem appropriate under the circumstances.

<sup>&</sup>lt;sup>1</sup> Debtor shall mean joint petitioners as necessary.

DATED: NOVEMBER 12, 2021

Respectfully submitted, BY: <u>/s/ Joseph Justin Saffle,</u> For .ONEMAIN FINANCIAL GROUP, LLC.

Joseph Justin Saffle MB No. 102975 Wilkinson Law Firm, P.C. 511 Keywood Circle Flowood, MS 39232 601-355-0005 (t) 601-355-0009 (f)

### CERTIFICATE OF SERVICE

I, Joseph Justin Saffle, of Wilkinson Law Firm P.C., hereby certify that the foregoing document was electronically filed with the Clerk of this Court using the CM/ECF system which will send notification of such filing to the following.

## **Attorney for Debtor**

Robert Hudson Lomenick Jr. robert@northmsbankruptcy.net

### **Trustee**

Locke D. Barkley
Lbarkley13@barkley13.com

United States Trustee
<u>USTPRegion05.AB.ECF@usdoj.gov</u>

Dated: November 12, 2021

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By: <u>/s/ Joseph Justin Saffle</u> Joseph Justin Saffle

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